

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Civil Action No. _____

**Glenda J. Mooneyham, on behalf of herself
and all others similarly situated,**

Plaintiff,

v.

**Bitcoin Depot, Inc.; Bitcoin Depot
Operating, LLC (d/b/a Bitcoin Depot);
Circle K Stores, Inc.,**

Defendants.

3:24-cv-1774-SAL

**RESPONSES TO LOCAL RULE 26.01
INTERROGATORIES**

Pursuant to Local Rule 26.01, Defendant Circle K Stores, Inc. ("Circle K") hereby responds to the interrogatories of the Court as follows:

INTERROGATORY A:

State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None.

INTERROGATORY B:

As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff requests a jury trial.

INTERROGATORY C:

State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Circle K is a nongovernmental corporation that is wholly owned by Alimentation Couche-Tard, Inc., a publicly-traded corporation. (TSX: ANCTF)

INTERROGATORY D:

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER: The Complaint alleges Plaintiff resides in this district.

INTERROGATORY E:

Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: None.

INTERROGATORY F:

If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Circle K is properly identified in the Complaint.

INTERROGATORY G:

If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: Other than the Plaintiff being liable for their own actions and alleged damages, Circle K does not, at this time, allege that other entities are liable to Circle K for the allegations in the Complaint. As discovery progresses and the details of Plaintiff's claims are determined, Circle K may identify additional persons or legal entities that may be liable.

INTERROGATORY H:

In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332 (a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER: The named Plaintiff and Defendants are citizens are different states. Plaintiff is a South Carolina citizen. Compl. ¶ 1. The Bitcoin Depot Defendants are citizens of Delaware and Georgia. Compl. ¶¶ 2-3. Circle K is a citizen of Texas and Arizona. Compl. ¶ 6. These allegations satisfy the diversity requirements of 28 U.S.C. § 1332.

This 10th day of April, 2024.

/s/ Amanda P. Nitto

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